



**Testimony of
Dr. Michelle J. Walker-Davis, Executive Director
DC Public Charter School Board**

**Student Immunization Hearing
Committee of the Whole
June 29, 2022**

Good morning, Chairman Mendelson and members of the Committee of the Whole. Thank you for the opportunity to testify at today's hearing on student immunizations. I am Dr. Michelle Walker-Davis, Executive Director of the DC Public Charter School Board.

DC PCSB fully supports getting all students up to date on their vaccinations, but we also realize we need to make it as easy as possible for families and schools to meet any requirements. I want to begin by thanking the Mayor, OSSE, and DC Health for developing a comprehensive plan to increase access to childhood vaccines and working to address health inequities. In addition to their main roles of educating students, schools have stepped up to help lead on this issue, but they cannot do it all on their own. And we appreciate the ongoing support from DC Health, OSSE, and other agencies.

DC PCSB and public charter schools are doing our part to support families this summer. Since the beginning of the pandemic, we have provided two health consultants with years of experience as a resource to schools. These health consultants are working with our schools to ensure each is ready for what the new year may hold whether it is a new COVID wave or enforcement of the No Shots No School policy.

Public charter schools have consistently hosted COVID vaccination sites and want to host the mobile health clinics DC Health and Children's National plan to roll out this summer. In particular, schools would like mobile units present at back-to-school nights and enrollment events to meet families where they are.

One piece of consistent feedback we receive from schools is that the paperwork required to get in compliance with No Shots No Schools is burdensome and sometimes complex. Families have a lot to juggle and rounding up all their vaccine information, potentially from a variety of providers, may not be as high on their list of priorities as putting food on the table and paying the bills. The key approach, over the course of the summer and fall, will be implementing the city's plan with fidelity and ensuring we break down administrative barriers for families and schools.

One solution to consider is creating a system that would allow schools to receive digital versions of student immunization records directly from their providers. This could lift the burden off of families, especially if schools could request documentation directly from the providers. We have heard from multiple school leaders that they believe they have students who comply with the requirements but are considered non-compliant due to a lack of documentation or the information not being available in the DOCIIS system.

The new DOCIIS system was put into place for this purpose, but schools report the system is not a cure-all for these burdens. For one, many families seek medical care in Maryland or Virginia, and those providers may not have access to DOCIIS nor the requisite training. We also hear that many providers have not used the system with fidelity and some charge families extra to complete school compliance documentation. Even for non Medicaid patients, it can be a barrier when medical providers charge patients for receiving compulsory medical forms.

In addition to a lack of documentation, the data in the different systems does not always match up, which leads schools to spend hours of staff resources cross-referencing their internal data with the data in DOCIIS. Schools are concerned with the current data disparities, and that inevitable mistakes could lead to student exclusion. That is why we partnered with DC Health and Children's National this month to convene school registrars to discuss the new DOCIIS system and ensure they know how to navigate the platform.

While schools are responsible for communicating vaccination status to families, we also know that many families actively seek out this information, but there is an information gap. Many of them do not know which vaccines their children need to get up to date on, and there is no data warehouse that families have access to search for this information. Families can use MyIR to search for their COVID vaccination status, but that system does not include information regarding MMR, polio, or other shots.

Another challenge is the lack of accounts each school is granted for DOCIIS. With only two employees granted access, it is much harder and time-consuming to cross-reference and sift through the data to identify the students and the immunizations needed. School nurses are often tasked with this work and are an integral part of this process. The relationship between the school nurse and the student registrar is critical to ensuring the data are accurate and families know what they need to do. However, many school nurses have been reassigned this year due to the staffing shortage and the lack of a consistent presence has made tracking data difficult. In addition, at schools with large enrollments, tracking documentation can be a nearly full-

time job, and throughout the school year, nurses have many more pressing matters to attend to.

Lastly, we need to consider what enforcement looks like and provide guidance to schools to ensure that campuses enforce the policy consistently using the same practices. Schools need guidance on how they can engage excluded students in learning and what processes they should follow if students continue to come to school despite being out of compliance. Many families will be surprised by enforcement efforts this year, and the city needs to take the lead on creating an enforcement strategy that is realistic and consistent for all schools to implement.

If we do not successfully implement our plan, the consequences will fall on students, and enforcement will be near impossible for schools. As of May, about 75.7% of public charter students were in compliance with the vaccination requirements. We cannot afford to force nearly 25% of students to stay home from school, especially when many of the students who are out of compliance with the vaccine requirements are those most in need of in-person learning.

DC PCSB and our schools fully support getting all students vaccinated and in compliance with No Shots No Schools. All our efforts should seek to ease the process for families and support schools that are already overwhelmed coming out of the pandemic. Thank you.